

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
NORTHERN DIVISION**

<b>In the Matter of the Petition</b>	
<b>Of</b>	<b>Case No. 24-cv-941-JKB</b>
<b>GRACE OCEAN PRIVATE LIMITED, as Owner of the M/V DALI,</b>	<b><u>IN ADMIRALTY</u></b>
<b>And</b>	
<b>SYNERGY MARINE PTE LTD, as Manager of the M/V DALI,</b>	
<b>for Exoneration from or Limitation of Liability</b>	

**THE STATE OF MARYLAND’S MOTION FOR A LETTER OF REQUEST**

NOW INTO COURT, through undersigned counsel, comes the State of Maryland, by and through Anthony G. Brown, Attorney General of Maryland, on its own behalf and on behalf of all its agencies (the “State”); the Maryland Transportation Authority (“MDTA”), the Maryland Port Administration (“MPA”), and the Maryland Department of the Environment (“MDE”) (collectively, “Claimants”), who respectfully request this Court issue the attached Letter of Request to allow the State to obtain relevant discovery from ZeroNorth A/S (“ZeroNorth”).

ZeroNorth is a Danish company based at Amagerfælledvej 106, 2300 Copenhagen S, Denmark. In 2024, ZeroNorth acquired the company Alpha Ori Technologies (“Alpha Ori”) and Alpha Ori’s software product, SMARTShip. The M/V DALI had SMARTShip installed onboard. The owners and managers of the M/V DALI utilized SMARTShip to remotely monitor the vessel. The communications of the owners and managers of the M/V DALI with Alpha Ori and ZeroNorth

will be critical in establishing how SMARTShip was utilized onboard the M/V DALI and what information shoreside personnel chose to monitor.

The Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters, as adopted and implemented at 28 U.S.C. § 1781, authorizes this Court to request assistance from Danish judicial authorities in obtaining evidence from ZeroNorth.

Therefore, the State respectfully requests that the Court sign and issue the Letter of Request attached as Exhibit A in order to facilitate the collection of evidence from ZeroNorth. A certified Danish translation of the Letter of Request is included.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I CERTIFY that on this 18th day of February 2025, the foregoing was filed in the United States District Court for the District of Maryland via the Court's CM/ECF filing system, which will provide notice of this filing to all counsel of record.

/s/ Margaret Fonshell Ward  
Margaret Fonshell Ward